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October 10, 2003

VIA Hand Delivery
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Re: Consent Order No. 31-07-02
SECTION V - REPORTING
WILLIAMSBURG RECEIVING & STORAGE
Third Quarterly Report: 2003
ISE Project # 02633061-02E

Gentlemen:

Pursuant to Section 5.2 of the referenced Consent Order (CO), this submittal is presented as the report for third quarter, 2003 (Q3-03) CO activities. In accordance with Section 5.2, this report is to be submitted to MDEQ on or before October 10, 2003. The Q4-03 Report will be submitted in accordance with Section 5.2 requirements on or before January 10, 2004.

IV. COMPLIANCE PROGRAM

Discharge Termination 4.1(a.)

The requirements of Section 4.1(a.) have all been met. Details regarding progress towards compliance with subparts (1) and (4) may be found in the prior quarterly progress report.

Lagoon Management and Odor Control 4.1(b.)

Since the effective date of the CO, no known instances of nuisance odor conditions emanating from the WRS plant have been documented by MDEQ Air Quality Division (AQD) pursuant to subpart (5) of this section. All requirements under Section 4.1(b.) have been met by WRS. During the second quarter, 2003 Williamsburg Receiving and Storage received correspondence from MDEQ-AQD documenting resolution of this matter.

Beginning early in second quarter of 2003, the aeration equipment serving the pond became operational again. Its renewed operation was initiated as a precaution to ensure compliance with Consent Order provisions and NREPA Part 55 Rules. On June 6, 2003 representative samples were acquired from the pond following considerable mixing and aeration. Analytical results indicate that the wastewater quality is greatly improved relative to its state one year ago. Analytical results from the June sampling event are attached and indicate that the wastewater oxygen demand has been satisfied. Both COD and BOD₅ analytical results suggest that aeration and dilution from precipitation have combined to lower oxygen demand.

Hydrogeologic Work Plan 4.1(c.)

Compliance with this Section was established in Q4-02 and has been maintained since. A Work Plan Supplement for Hydrogeologic Investigation has been completed and submitted to MDEQ in accordance with CO requirements. Comments received from MDEQ review of the Work Plan and Work Plan Supplement have been integrated into the Investigation, which is underway. Communications were provided to MDEQ (Dated June 16, 2003) in conjunction with Consent Order reporting requirements to verify the correct submittal date of the Hydrogeologic Study Report as identified within the Consent Order.

Outfall sampling required under 4.1(c.)(iv) was conducted in May and June of second quarter. Results were provided in the prior quarterly report. Current activities focus upon installation of additional monitoring wells necessary under the approved Work Plan. Drilling activities and monitoring well installations are slated for the week of October 15, 2003.

Brine Storage and Secondary Containment 4.1(d.)

The Secondary Containment Work Plan required under this part was submitted on February 12, 2003. On September 21, 2003 a letter response (dated September 19th) from MDEQ to the February 12, 2003 Secondary Containment Work Plan was received. The MDEQ Work Plan response letter indicated that the February 12, 2003 Work Plan is not sufficient and requires a supplement to address MDEQ's concerns within 30 days of receipt of the MDEQ letter. The Supplement to the February 12, 2003 Work Plan will be submitted on or before October 22, 2003.

Solid Waste Disposal 4.1(e.)

Compliance with this part was established before the effective date of the CO. No solid wastes have been burned at the facility.

V. REPORTING

All reporting submittals required under the CO have been delivered, except as noted above for Section 4.1(c.) and 4.1(d.) final submittals.

Respectfully submitted,
INLAND SEAS ENGINEERING, INC.



Andrew Smits, P.E.
Environmental Engineering
Department Manager

cc. Mr. Christopher Hubbell- WRS
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